

From: [Ellens, Newton](#)
To: [Jose Cisneros](#)
Cc: [Kenneth Myers](#); [MAUPIN, NATALIE](#)
Subject: RE: East Chicago Sanitary District Pretreatment Audit Findings
Date: Friday, December 17, 2021 12:12:00 PM
Attachments: [image001.png](#)
[image002.png](#)
[image003.png](#)
[image004.png](#)

Dear Jose,

Natalie is correct in her determination that the District's practice of receiving IU reports via email does not comply with the Cross-Media Electronic Reporting Rule (CROMERR) at 40 C.F.R. Part 3.

Please note the following statements from page 1 of the EPA guidance Natalie cited:

CROMERR applies if:

- you receive submissions electronically from regulated facilities,
- those submissions are requirements of an EPA-authorized program, and
- electronic submissions are accepted in lieu of paper submissions.

It is also important to note that attaching reports to emails is not considered to be CROMERR-compliant because it fails to meet numerous CROMERR requirements. This is true regardless of how the document is signed. However, CROMERR does not prevent programs from receiving non-CROMERR compliant regulatory data submissions by email as a "courtesy" copy, so long as paper-based records of this data are separately retained as the legal copy of record.

Take care,

Newton Ellens

Pretreatment Program Manager

U.S. Environmental Protection Agency (ECW-15J)

77 West Jackson Boulevard

Chicago, Illinois 60604

(312) 353-5562

From: MAUPIN, NATALIE <NMAUPIN@idem.IN.gov>
Sent: Friday, November 19, 2021 2:22 PM
To: Jose Cisneros <jcisneros@eastchicago.com>
Cc: Ellens, Newton <ellens.newton@epa.gov>; Kenneth Myers <kmyers@eastchicago.com>
Subject: RE: East Chicago Sanitary District Pretreatment Audit Findings

Jose,

I'm writing in response to your report where you requested IDEM and EPA's input regarding ECSD's allowance of receiving self-monitoring reports electronically from your permitted users. It is IDEM's

stance (I'll let Newton speak on behalf of EPA) that ECSD is not permitted to continue this practice. To continue to do so, ECSD would have to submit a CROMERR application to and receive approval from EPA. To further support this determination, I am including the link to EPA's guidance document titled [Publicly-Owned Pretreatment Works \(POTW\) Programs and Electronic Reporting](https://www.epa.gov/cromerr/cromerr-compliance-publicly-owned-treatment-works-pretreatment-program). Please note the last paragraph on the first page. If you have any further questions, please ask me or Newton.

<https://www.epa.gov/cromerr/cromerr-compliance-publicly-owned-treatment-works-pretreatment-program>

Thank you,
Natalie

Natalie Maupin
Pretreatment Compliance Coordinator
IDEM – Office of Water Quality
317-232-8729

From: Jose Cisneros <jcisneros@eastchicago.com>
Sent: Friday, September 17, 2021 2:44 PM
To: MAUPIN, NATALIE <NMAUPIN@idem.IN.gov>
Cc: Ellens, Newton (ellens.newton@epa.gov) <ellens.newton@epa.gov>; Bye, Julie <JBYE@idem.IN.gov>; McNeil, Tammie <tmcneil@idem.IN.gov>; Ream, Nicholas <NREAM@idem.IN.gov>; Kenneth Myers <kmyers@eastchicago.com>; Jose Cisneros <jcisneros@eastchicago.com>
Subject: RE: East Chicago Sanitary District Pretreatment Audit Findings

**** This is an EXTERNAL email. Exercise caution. DO NOT open attachments or click links from unknown senders or unexpected email. ****

Dear Natalie:

As attached, please find the East Chicago Sanitation District (IN0022829) response to IDEM's and USEPA's findings as associated to the recent audit of the District's Pretreatment operation. Please also note as due to email transmission related constraints that I will be sending additional emails which will include all supporting documentation. In closing, thank you once again for your special consideration of the District's submission extension request and as I will remain attentive to timely responding to any relevant inquiries that you and/or your colleagues may have, please also note as detailed within the Compliance Schedule that I will keep you timely updated relative to the District's conformance to the various compliance requirements.

Respectfully Yours,

Jose Cisneros
Pretreatment Coordinator
East Chicago Sanitary District Wastewater

5201 Indianapolis Blvd.
East Chicago, IN 46312
O: (219)516-2317
F: (219)391-8254



Visit us at...



From: MAUPIN, NATALIE [<mailto:NMAUPIN@idem.IN.gov>]
Sent: Tuesday, July 20, 2021 9:18 AM
To: Jose Cisneros
Cc: Kenneth Myers; Bye, Julie; McNeil, Tammie; Ream, Nicholas; Ellens, Newton
(ellens.newton@epa.gov); (acopeland@eastchicago.com)
Subject: RE: East Chicago Sanitary District Pretreatment Audit Findings

Jose,

Your request for an additional 30 days to respond to the inspection summary/violation is approved.
I will expect your response by no later than Monday, September 13, 2021.

Thank you,
Natalie

From: Jose Cisneros <jcisneros@eastchicago.com>
Sent: Tuesday, July 20, 2021 10:10 AM
To: MAUPIN, NATALIE <NMAUPIN@idem.IN.gov>
Cc: Kenneth Myers <kmyers@eastchicago.com>; Bye, Julie <JBYE@idem.IN.gov>; McNeil, Tammie
<tmcneil@idem.IN.gov>; Ream, Nicholas <NREAM@idem.IN.gov>; Ellens, Newton
(ellens.newton@epa.gov) <ellens.newton@epa.gov>; (acopeland@eastchicago.com)
Subject: RE: East Chicago Sanitary District Pretreatment Audit Findings

**** This is an EXTERNAL email. Exercise caution. DO NOT open attachments or click links from unknown senders or unexpected email. ****

Dear Natalie:

Good Morning to You.

Thank you again for timely returning my call and per our conversation, I respectfully submit for your special consideration, the District's request for an additional 30 days or a total of 60 calendar days to fully assess and respond to the Inspection Summary/Violation Letter. The additional time will serve to further enable the District to more comprehensively assess and implement a course of action which will address the various non-conformances as listed within the Inspection Summary/Violation Letter (hereafter, "Letter"). Furthermore and within 30 calendar days from the date of the Letter, the District will provide a detailed explanation which further documents a timeline relative to bringing into conformance, the various non-compliances as listed within Attachments I and II. Thank you again for your special consideration of the District's request for a time extension and should you require additional clarification, please be advised that I remain attentive to receiving the same.

Respectfully Yours,

Jose Cisneros

Pretreatment Coordinator
East Chicago Sanitary District Wastewater
5201 Indianapolis Blvd.
East Chicago, IN 46312
O: (219)516-2317
F: (219)391-8254



Visit us at...



From: MAUPIN, NATALIE [<mailto:NMAUPIN@idem.IN.gov>]

Sent: Tuesday, July 13, 2021 2:32 PM

To: Kenneth Myers

Cc: Bye, Julie; McNeil, Tammie; Ream, Nicholas; Ellens, Newton (ellens.newton@epa.gov); Jose Cisneros; acopeland@eastchicago.com

Subject: East Chicago Sanitary District Pretreatment Audit Findings

The attached document includes the findings of a recent pretreatment program audit conducted by IDEM and U.S. EPA staff. Please be sure these documents are reviewed by the appropriate individuals. If the letter requires a response, we encourage you to respond via email by sending your response to nmaupin@idem.in.gov. Thank you.

Gary Starks, Chief
Compliance Data Section

Disclaimer

The information contained in this communication from the sender is confidential. It is intended solely for use by the recipient and others authorized to receive it. If you are not the recipient, you are hereby notified that any disclosure, copying, distribution or taking action in relation of the contents of this information is strictly prohibited and may be unlawful.

This email has been scanned for viruses and malware, and may have been automatically archived by **Mimecast Ltd**, an innovator in Software as a Service (SaaS) for business. Providing a **safer** and **more useful** place for your human generated data. Specializing in; Security, archiving and compliance. To find out more [Click Here](#).

Disclaimer

The information contained in this communication from the sender is confidential. It is intended solely for use by the recipient and others authorized to receive it. If you are not the recipient, you are hereby notified that any disclosure, copying, distribution or taking action in relation of the contents of this information is strictly prohibited and may be unlawful.

This email has been scanned for viruses and malware, and may have been automatically archived by **Mimecast Ltd**, an innovator in Software as a Service (SaaS) for business. Providing a **safer** and **more useful** place for your human generated data. Specializing in; Security, archiving and compliance. To find out more [Click Here](#).